

---

## North Coast Regional Water Quality Control Board

August 8, 2014

Henry Mikus, Executive Director  
Sonoma County Waste Management Agency  
2300 County Center Drive, Ste. B-100  
Santa Rosa, CA 95403

Dear Mr. Mikus:

**Subject:** Comments on Sonoma County Waste Management Agency's (SCWMA) July 2014 Plan and Schedule to Cease All Discharges of Compost Wastewater to Receiving Waters

**File:** Sonoma County Central Disposal Site, WDRs Order No. R1-2013-0003

We are in receipt of the above-referenced plan and schedule (Plan) to address continuing discharges of compost wastewater to waters of the State and United States. The Plan is part of the SCWMA's evolving response to address a directive under Waste Discharge Requirements (WDRs) Order No. R1-2013-0003, for the County of Sonoma's Central Disposal Site, that requires submittal of a plan and schedule, by May 15, 2013, to eliminate discharges of wastewater from the composting area to receiving waters. That requirement implements the Water Quality Control Plan for the North Coast Region (Basin Plan) prohibition on point source discharges to coastal streams; the Basin Plan indicates that existing discharges to such waters should be eliminated at the earliest practicable date.

Regional Water Board staff have reviewed the Plan and have discussed various aspects of the Plan with both you and Stu Clark. Based on our review and discussion of the Plan, we have the following response and comments.

The Plan describes and provides an anticipated schedule for implementing three parallel efforts to address wastewater discharges over both the short and long term:

### Long-term plans

#### 1) Large pond

The Plan provides design details for a proposed 29,000,000-gallon compost stormwater pond, to be classified as a Class II surface impoundment, per California Code of Regulations, title 27 (Title 27). The Plan also describes the anticipated process to obtain necessary approvals to construct the pond, and a schedule for both the permitting and construction of the pond. The Plan indicates a number of decision points where the SCWMA may opt to abandon the project due to cost or a

change in plans. Specifically, final siting and design features associated with the proposed permanent composting facility, either at the Central Disposal Site or at the "Site 40" alternative may lead to a determination that the pond is no longer needed or that a smaller or differently sited pond is more appropriate. Given that various critical decision points regarding or affecting the SCWMA's intentions with regard to pursuing the pond project are pending, most notably in August and November 2014, we are not commenting on the pond design at this time. We will discuss this proposal with you pending the outcome of the SCWMA Board's November 2014 meeting. In the meantime, to facilitate our timely review and approval of your proposal, we encourage you to ensure that all pond siting, design, construction, operations, monitoring, financial assurance, and closure information is consistent with Title 27 requirements for Class II surface impoundments.

## 2) Zero discharge facility

The Plan indicates that the SCWMA proposes to select a final site for the new compost facility, either at the Central Disposal Site or at Site 40, and to pursue permitting/approvals, design, and construction of the facility at the preferred site.

The schedule provided indicates that efforts associated with both the zero discharge facility and the large pond (should the latter project be carried through to completion) are expected to be implemented on roughly the same schedule, completed and operational either by winter 2016 or winter 2017. Accordingly, assuming that the SCWMA does not opt to discontinue operations on the current compost site before a long-term zero discharge solution is implemented, it is likely that under any long-term scenario, the current compost facility will need to rely on interim measures to control and minimize discharge over the winters of 2014-15, 2015-16, and possibly 2016-17.

## Short-term plans

### 3) Interim measures

The Plan discusses four components intended to reduce the volume or improve the quality of wastewater discharged from the compost operations area. These components are more or less the same as those employed or discussed over the previous rainy season, but have been expanded or refined for the upcoming rainy season. Specifically, these measures include: a) reduced working area on the compost deck; b) combining the two ponds directly downgradient of the compost area to increase storage capacity; c) additional sediment/solids control features on the compost deck; and d) pumping, hauling, and disposing of compost contact water at appropriate offsite locations.

#### a) Reduced working area

The Plan indicates that drainage from a portion of the compost deck, comprising approximately 18% of the total deck area, can be relatively easily isolated from runoff from the remainder of the deck. Accordingly, the SCWMA board has authorized the purchase of a new windrow turner that will allow the compost operator to consolidate compost windrows and to ensure that wet weather operations are limited to the larger area of the deck, and that the smaller portion that drains separately is kept free of materials or activities that could produce leachate or that could introduce compost-related wastes into stormwater runoff.

We are encouraged by your efforts to find ways to reduce the compost working area and, thus, to reduce the volume of wastewater generated during rainy periods.

b) Pond combination

Continuing to develop a proposal made by SCWMA staff in early 2014, the Plan describes a project to enlarge and combine the two sediment ponds located directly downgradient of the compost deck, ponds SP-4 and SP-8. Project drawings and specifications submitted August 4, 2014 show a pond lined with 60-mil geomembrane over a geocomposite material, and with a 20-foot wide access ramp extending from the pond perimeter to the pond bottom. The liner on the pond bottom will be covered with a layer of sand overlain by aggregate base. The pond design includes a spillway that should ensure that a 2 foot minimum freeboard is maintained. This project will provide approximately 2 million gallons of holding capacity for runoff from the compost deck, effectively doubling the available storage capacity over what is presently available.

We are encouraged that you have continued to pursue this idea, and hope that you are able to complete the project as proposed in advance of the 2014 rainy season. We understand that the pond design is also subject to review and approval by Sonoma County and Republic Services. Please keep us apprised of status of their review/ approval, as well as subsequent progress in pond construction and completion. Finally, as indicated in a July 22, 2014 email from Diana Henrioulle to you, as well as in a telephone call between Ms. Henrioulle and Stu Clark on August 1, 2014, we are interested in receiving further information about proposed pond maintenance and operations. On August 6, 2014, you provided a one-page document entitled "Operations Plan." Ms. Henrioulle will review this submittal and follow up with any questions or comments in separate correspondence.

c) Additional best management practices on the compost deck

Over the previous rainy season, SCWMA installed check dams and straw wattles at various key points on the compost deck and leading from the deck to the sediment basins. The Plan indicates that for upcoming rainy seasons, SCWMA intends to install additional sediment traps and to protect finished compost material from contact with rain water through tarping and/or berming.

While noting that management practices/measures for runoff treatment can likely only remove a small fraction of the pollutants entrained in the runoff from the compost deck, we acknowledge that pollutants removed are pollutants not discharged to the stormwater system and, potentially, to waters of the State and the United States. In addition, measures to prevent rain water from coming into contact with pollutant sources will also help to improve the overall quality of the runoff leaving the compost area. We would expect that any improvements to the quality of the wastewater from the compost area will help to increase SCWMA's options for offsite wastewater disposal as it should reduce the potential effect the wastewater may have on UV transmittance. We support your continued efforts to improve the quality of the wastewater from the compost deck through the use of best management practices.

d) Pump/truck

Over the previous rainy season, SCWMA commenced an effort to minimize the amount of compost water discharged to surface waters by pumping and trucking wastewater to the City of Santa Rosa's Laguna Wastewater Treatment Facility. We understand that through those efforts, approximately 2 million gallons of wastewater was removed from the site, at a rate of up to 100,000 gallons per day, and consequently prevented from discharging to receiving waters. The Plan indicates that over the upcoming rainy season, SCWMA proposes to continue and expand the pumping and hauling effort.

We understand that the trucking company used last year committed to hauling up to 300,000 gallons of wastewater per day, if the disposal destination is to be the Laguna facility. However, we understand that the total amount that the Laguna facility will be able to handle in the future is uncertain at this time, due to questions about the effects that the compost wastewater may have on the UV transmittance of effluent under treatment at the Laguna facility. As a result, you indicate in the Plan that SCWMA is exploring disposal options with several other wastewater treatment facilities, and that a better estimate of the minimum daily outhaul capacity will not be available until mid to late September.

In telephone calls between Stu Clark and Regional Water Board staff on August 1, 2014 and in email correspondence provided August 4, 2014, we understand that at this time, SCWMA can commit to pumping and trucking out a minimum of 60,000 gallons of wastewater per day, Monday through Friday, if available in the SP4/SP8 combined pond, for disposal at East Bay Municipal Utility District in Oakland and/or at the Laguna facility. Further, we understand from Ms. Henriouille's conversation with Stu Clark on August 1, 2014 that the available budget for this component of the interim plan will accommodate additional pumping and trucking for offsite disposal in the event that additional disposal capacity/locations are identified. Finally, we understand that if additional disposal options or additional disposal capacity at locations nearer than Oakland become available, you will work to optimize the daily outhaul of wastewater within the available budget.

We believe this element is critical to the success of efforts to minimize compost wastewater discharges to receiving waters over the next few or several winters while long-term solutions are being constructed and brought online. We strongly encourage you to make every effort to maximize the amount of wastewater you can remove each day from the site during and between rainfall events.

Taken as a whole, the proposed interim measures represent a significant addition to the measures already in place since the past rainy season. These measures will provide a net improvement in the quality of runoff from the compost deck, a net increase in the amount of runoff that can be stored onsite, a net increase in the amount that can be hauled off the site, and, overall, both a net reduction in potential runoff and a lower pollutant load in any such runoff. We encourage you to aggressively implement the interim measures and to continue to work on the long-term solutions in earnest.

As we have discussed with you, after we have received the additional information you propose to furnish in mid to late September, we expect to develop a Time Schedule Order (TSO) incorporating the key elements, milestones, deliverables, and due dates you have presented in your Plan and provided us in subsequent discussions. In addition, we expect to include monitoring and reporting requirements and a description of potential enforcement consequences in the event of missed deadlines. With respect to our response to compost wastewater discharges to receiving waters occurring during the period before a long-term zero discharge option is implemented, we remind you that we retain our enforcement authority, and that we use that authority with discretion. Your continued and diligent efforts at pursuing both the long-term solution and in continuing to identify and implement appropriate interim measures to minimize the amount of wastewater discharged to receiving waters will factor significantly in our decisions with respect to the nature of any enforcement response we might consider or recommend to the Board.

We look forward to continuing to work with you in this matter, and thank you for your efforts to date. Please contact Diana Henriouille at (707)576-2350 or, by email, at [Diana.Henriouille@waterboards.ca.gov](mailto:Diana.Henriouille@waterboards.ca.gov) or David Leland at (707)576-2069 or, by email, at [David.Leland@waterboards.ca.gov](mailto:David.Leland@waterboards.ca.gov) if you have any questions or comments.

Sincerely,

Original Signed By David Leland For

Matthias St. John  
Executive Officer

140808\_DSH\_ef\_Central\_Compost\_response\_to\_SCWMA\_zero\_disch\_plan

cc: Stu Clark, DEI - [stu@dedwardsinc.com](mailto:stu@dedwardsinc.com)  
Susan Klassen, SCDPW - [Susan.Klassen@sonoma-county.org](mailto:Susan.Klassen@sonoma-county.org)  
Leslye Choate, Sonoma County LEA - [Leslye.Choate@sonoma-county.org](mailto:Leslye.Choate@sonoma-county.org)  
Trish Pisenti, SCDPW - [Trish.Pisenti@sonoma-county.org](mailto:Trish.Pisenti@sonoma-county.org)  
Patrick Carter, SCWMA - [Patrick.Carter@sonoma-county.org](mailto:Patrick.Carter@sonoma-county.org)  
Will Bakx, Sonoma Compost - [willbakx@sonomacompost.com](mailto:willbakx@sonomacompost.com)  
Alan Siegle, Sonoma Compost - [alansiegle@sonomacompost.com](mailto:alansiegle@sonomacompost.com)  
Rick Downey, Republic Services - [rdowney@republicservices.com](mailto:rdowney@republicservices.com)  
Roger Larsen - [rogerlarsen@aol.com](mailto:rogerlarsen@aol.com)  
Michael Lozeau, Lozeau Drury, LLP - [michael@lozeaudrury.com](mailto:michael@lozeaudrury.com)